REMARKS

This application, as amended herein, contains claims 1 – 24, 28 – 30, and 31 – 35. Claims 25 – 27 were previously cancelled.

Claims 1, 2, 4, 5, 9, 10, 12-14, 19, 20, 23, 24 and 30 were rejected under 35 U.S.C. 102(e) as being anticipated by Vu et al. Claims 3, 11 and 31 – 33 were rejected as being obvious over Vu et al. Claims 6 – 8, 15 – 18, 21, 22, 28, 29, 34 and 35 were rejected were rejected as being obvious over Vu et al. in further view of the newly cited Makipaa et al. In view of the amendments made herein, and the remarks below, these rejections are respectfully traversed.

Applicants' invention is directed, generally, to deriving different views for the same document, allowing viewing of the entire document, and all of its elements, with different emphasis placed on different elements in different views, to permit easy viewing. Vu et al. do not teach or suggest doing this, but instead use different documents (training documents) to establish an historical database, and categorizes a new document to determine which historical layout to use for that new document. At best Vu et al. suggest using historical data stored on a remote system supplying the document. For the specific reasons set forth for various claims below, it is submitted that view does not teach or suggest Applicants' invention.

13

Applicants' invention, as set forth in claim 1, as amended herein, is directed to a digital document browsing system comprising a layout engine, for determining the layout of a digital document based on digital document display form historical data <u>of use of</u> said document, acquired previously, <u>by said browsing system</u>; a view generator, for generating, in accordance with said layout determined by said layout engine, data relating to the display form of said digital document; and a user interface, for displaying said digital document on a display device based on said data relating to said display form generated by said view generator. Applicant's invention uses local data for the document, which is stored on the system that will display the document. For the reasons in the immediately preceding paragraph, it is submitted that claim 1 is patentable.

Claim 2 states that the layout engine employs historical data when allocating a display area, for the display form of the digital document, for <u>each element</u> constituting said digital document. Paragraph [0074], last sentence of Vu et al. clearly teaches away from claim 2, in that the summary selector 17 of Vu et al. flags features so that they are ignored during the summary generation process. Thus, these features are not displayed. This is exactly the opposite of Applicants' invention, as set forth in claim 2, which specifies that all elements are displayed. Thus, claim 2 is directed to patentable subject matter.

14

Claim 3, which depends from claim 1, has been amended to state that the history database is <u>within said browsing system</u>. Claim 3 further patentably distinguishes from Vu et al.

Claim 6 has been amended to specify that all elements are <u>always</u> displayed. This provides an advantageous patentable distiction from Makipaa, where a display element may be moved to a successive screen or is simply left out in certain cases (claims 3, 4 and 5 of Makipaa et al.). Thus, Makipaa actually teaches away from Applicants' invention, and it is submitted that claim 6 is also directed to patentable subject matter.

Claim 9 is patentable for similar reasons to those set forth for claim 1. Specifically, summaries are prepared based on historical data related to display forms previously used for display of the same document, <u>on the same browsing system</u>. It is submitted that claim 9 is not anticipated or rendered obvious by Vu et al., and is thus also directed to patentable subject matter.

Claim 12 is patentable for the same reasons set forth above with respect to claim 9.

Claim 15 has been amended to state that the structure of the digital document is maintained so as to <u>always</u> include all of its elements. Again, in the last sentence of paragraph [0074], Vu et al teach away for this approach. As noted above with respect to claim 6, Makipaa et al. also

15

teaches away from claim 15. Thus, claim 15 is also patentable.

Claim 19 has been amended to recite a summarization history database, in which historical data for the summarization of sentences in a document by said summarization system is stored; and a summarization engine, for summarizing sentences based on said historical data stored in said summarization history database for said document. Again, this is contrary to the teachings of Vu et al., which uses historical data of a set of different (training) documents, or at best, history of other users of a document stored remotely may be accessed. Thus, it is submitted that claim 19 is patentable.

Claim 21 has been amended to recite a summary that is prepared based on historical data related to a display form for the document that was previously used for the document on said display device. Further all elements of the document are always displayed on one screen. Vu et al. does not teach or suggest these approaches, as noted above. Makipaa et al. actually teach away from this approach. Thus, it is submitted that claim 21 is patentable.

Claim 22 has been amended to recite that all elements of the document are always presented on one screen. Again, this is contrary to the last sentence of paragraph [0074] of Vu et al., and to the teachings of Makipaa et al. Thus, it is submitted that claim 22 is patentable, as is claim 29, which has been amended in an analogous manner.

Claim 23 recites obtaining a target sentence to be summarized; obtaining historical data related to a summary for said target sentence from a summarization history database of a system used to summarize said sentence in which historical data are stored that are related to a previous summarization of a document containing said sentence, by said system; and determining which parameters are required for the preparation of said summary based on said historical data, and preparing said summary of said target sentence based on said parameters. Again, this is patentably distinguishable from Vu et al., where unrelated training documents are used. Claim 30 is also patentable, due to analogous amendments made therein.

Claims 28 has been amended to recite using historical day for display on a specific display device. Thus, it is submitted that claim 28 is also directed to patentable subject matter.

Claims 31 - 35 further distinguish Applicants' invention from Vu et al. Specifically, claims 31 and 32 state that the user interface is configured to receive a view update request based on an operation performed by a user, the user interface causing the view generator to generate a new view in response to the view update request. Support for these claims may be found in the specification at page 12, paragraph [0065]. The only possibly pertinent teaching in Vu et al. concerning display is set forth in the last sentence of paragraph [0020] on page 2 of Vu et al. Thus, claims 31 and 32 are patentable. Claim 33 is

17

similar in many respects to claims 31 and 32, and the same rationale applies.

Claim 34 depends from claim 18 and has been amended to recite that all elements of the digital document are <u>always</u> displayed on one screen. Again this is in sharp contrast to Vu et al., or Makipaa et al. where certain elements may not be displayed at all. Claim 34 is directed to patentable subject matter.

Claim 35 depends from claim 6 and specifies that importance levels increase as time increases since information was last displayed. Support for this claim may be found in the last paragraph of paragraph [0079], on page 16, of the specification. Vu et al. teaches nothing of the kind. Claim 35 is directed to patentable subject matter.

The remaining claims depend from one of the independent claims discussed above. These claims have further recitations, which in combination with those of the claim from which they depend are not taught or suggested by the art of record. For the reasons set forth above these claims are also directed to patentable subject matter.

A check for $1,020 for a three-month extension of time to file this paper is enclosed.

Respectfully submitted,

David Aker   _5/1/2006_
David Aker, Reg. No. 29,277   Date
23 Southern Road
Hartsdale, NY 10530   Tel. & Fax 914 674-1094

18